

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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GUCCI AMERICA, INC.,

Plaintiff,

- against -

GUESS?, INC., MARC FISHER FOOTWEAR  
LLC, THE MAX LEATHER GROUP/CIPRIANI  
ACCESSORIES, INC., SEQUEL AG, K&M  
ASSOCIATES L.P., VIVA OPTIQUE, INC.,  
SIGNAL PRODUCTS, INC. and SWANK, INC.,

Defendants.  
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Civil Action No. 09cv4373  
(SAS)(JLC)

**NOTICE OF MOTION PURSUANT TO FEDERAL RULE 26(c) FOR  
A PROTECTIVE ORDER AGAINST THE DISCLOSURE OF THE PRIVILEGED  
COMMUNICATIONS OF NON-PARTY GUCCIO GUCCI S.P.A.'S IN-HOUSE  
INTELLECTUAL PROPERTY COUNSEL VANNI VOLPI**

PLEASE TAKE NOTICE that Plaintiff Gucci America, Inc. hereby moves, pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, before the Honorable James L. Cott, United States Magistrate Judge, United States District Court, Southern District of New York, 500 Pearl Street, New York, New York, and in accordance with the briefing schedule established by the Court, for a protective order against the disclosure of the privileged communications of non-party Guccio Gucci S.p.A.'s in-house Intellectual Property Counsel Vanni Volpi.


PLEASE TAKE FURTHER NOTICE that in support of said motion, Plaintiff will rely upon the following materials submitted herewith:

- 1) Declarations of Vanni Volpi, Daniela Della Rosa, Esq., Cheryl Solomon, Esq., Fausto Pocar, and Louis S. Ederer, Esq., and all exhibits annexed thereto; and
- 2) Memorandum of Law In Support of Plaintiff Gucci America, Inc.'s Motion for a Protective Order Against the Disclosure of the Privileged Communications of Non-Party Guccio Gucci S.p.A.'s In-House Intellectual Property Counsel Vanni Volpi Moss.

Dated: New York, New York  
April 2, 2010

Respectfully submitted,

ARNOLD & PORTER LLP

By: 

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*Attorneys for Plaintiff Gucci America, Inc.*